

**From:** Andrew and Susan Brengle [mailto:brengle@comcast.net]  
**Sent:** Wednesday, April 04, 2012 1:48 PM  
**To:** Baskin, Kathleen (EEA)  
**Cc:** irwainfo@ipswichriver.org  
**Subject:** SWMI comment

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)  
Director of Water Policy and Planning  
Executive Office of Environmental Affairs  
100 Cambridge Street  
Boston, MA

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. As a resident of Ipswich and a lucky beneficiary of all aspects of the Ipswich River, I am very pleased that the state has undertaken such an ambitious and comprehensive effort to better manage its fresh water resources. From its fundamental service as a water source to its recreational benefits such as pleasure boating, swimming, fishing, and bird watching, the Ipswich River Watershed both sustains life and enhances lifestyles. It is also a river system that remains on the edge. 2011 was fortunately a wet year, but 2012 is shaping up to be much drier and the kind of year that severely stresses the river and all its dependent habitats and wildlife. Our efforts on behalf the Ipswich River and other vulnerable watersheds throughout the state must use all the tools at our disposal.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research. Thank you for the opportunity to comment.

Sincerely,

Andrew Brengle  
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